

1 PHILLIP A. TALBERT  
United States Attorney  
2 CHRISTOPHER D. BAKER  
Assistant United States Attorney  
3 4550 California Avenue, Suite 640  
Bakersfield, CA 93309  
4 Telephone: (661) 489-6150  
Facsimile: (661) 489-6151

5  
6 Attorneys for Plaintiff  
United States of America

7 IN THE UNITED STATES DISTRICT COURT  
8  
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

CASE NO. 1:21-CR-00107-DAD-BAM

11 Plaintiff,

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
AND ORDER

12 v.

13 CARLOS IVAN CAMPANA,

DATE: March 9, 2022

14 Defendant.

TIME: 1:00 p.m.

COURT: Hon. Barbara A. McAuliffe

16  
17 STIPULATION

18 Plaintiff United States of America, by and through its counsel of record, and defendant, by and  
19 through defendant's counsel of record, hereby stipulate as follows:

20 1. By previous order, this matter was scheduled for a status conference on March 9, 2022.

21 2. By this stipulation, the parties move to continue the status conference until April 27,  
22 2022, or the Court's earliest convenience, and to exclude time from calculation under the Speedy Trial  
23 Act between March 9, 2022, and April 27, 2022.

24 3. The parties agree and stipulate, and request that the Court find the following:

25 a) Initial discovery was transmitted to defendant on May 3, 2021. This discovery consisted  
26 of 329 Bates-numbered items, including numerous audio and video recordings and reports of  
27 investigation. The initial discovery was transmitted under cover letter inviting defense counsel  
28 to contact the government in the event he wished to inspect any physical evidence seized during

1 the investigation of the case.

2 b) On June 25, 2021, the government transmitted supplemental discovery to the defendant,  
3 consisting of Spanish-to-English transcriptions of recorded telephone calls previously produced.  
4 On September 28, 2021, the government transmitted additional supplemental discovery to the  
5 defendant, consisting of a laboratory report of controlled substances seized during the  
6 investigation.

7 c) Counsel for defendant desires additional time to review discovery, consult with his client,  
8 conduct investigation and research related to the charges, and to otherwise prepare for trial.

9 d) Counsel for defendant believes that failure to grant the above-requested continuance  
10 would deny him the reasonable time necessary for effective preparation, taking into account the  
11 exercise of due diligence.

12 e) Based on the above-stated findings, the ends of justice served by continuing the case as  
13 requested outweigh the interest of the public and the defendant in a trial within the original date  
14 prescribed by the Speedy Trial Act.

15 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq.,  
16 within which trial must commence, the time period of March 9, 2022 to April 27, 2022,  
17 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv), because it results  
18 from a continuance granted by the Court at defendant's request on the basis of the Court's  
19 finding that the ends of justice served by taking such action outweigh the best interest of the  
20 public and the defendant in a speedy trial.

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1       4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
2 Speedy Trial Act provide that additional time periods are excludable from the period within which a trial  
3 must commence.

4       IT IS SO STIPULATED.  
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6       Dated: March 2, 2022

PHILLIP A. TALBERT  
United States Attorney

8       By: /s/ CHRISTOPHER D. BAKER  
9                   CHRISTOPHER D. BAKER  
10                   Assistant United States Attorney

11                  /s/ DAVID A. TORRES  
12                  DAVID A. TORRES  
13                  Counsel for defendant Carlos Ivan Campana

14                  **ORDER**

15       IT IS SO ORDERED that the status conference is continued from March 9, 2022, to **April 27,**  
16 **2022, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe.** Time is excluded pursuant to 18  
17 U.S.C. § 3161(h)(7)(A), B(iv).

19       IT IS SO ORDERED.  
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Dated: March 2, 2022

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE